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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 ROBERT BARCELON, an individual)
11) Case no.: 2:18-cv-01493-GMN-DJA
Plaintiff,)
12 Vs.)
13 LANDFORCE CORPORATION)
14 Individually; ALBERT LEON HARRIS,)
Individually; DOES I-X and ROE)
15 CORPORATIONS I-X, inclusive,)
16 Defendants.)
17)

18 **PLAINTIFF'S UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO**
19 **DEFENDANTS' FOUR MOTIONS FILED WITH THE COURT AS DOCUMENTS 68,**
20 **69, 70, 71**
(First Request)

21 COMES NOW Plaintiff, by and through his attorneys, STOVALL & ASSOCIATES, and
22 hereby files unopposed motion to Extend Time to respond to Defendants' four motions filed on
23 April 16, 2020 as documents 68, 69, 70, 71 from April 30, 2020 to May 4, 2020.

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1 This motion is based upon the pleadings and papers on file herein, the Memorandum of
2 Points and Authorities attached hereto, and any oral argument this Court may entertain at the
3 hearing of this Motion.

4 Dated this 30th day of April, 2020.

STOVALL & ASSOCIATES

5
6 */s/ Ross Moynihan*

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8 ROSS H. MOYNIHAN, ESQ.
9 Nevada Bar No. 11848
10 2301 Palomino Lane
11 Las Vegas, Nevada 89107
12 *Attorney for Plaintiff*

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14 **DECLARATION OF PLAINTIFF'S COUNSEL IN SUPPORT OF PLAINTIFF'S**

15 **MOTION TO EXTEND TIME TO RESPOND TO DEFENDANTS' MOTIONS**

16 ROSS MOYNIHAN, declares and states as follows:

17 1. I am an attorney at the Law Office of Stovall & Associates, counsel for Plaintiff,
18 and am licensed to practice law in the State of Nevada.

19 2. On April 16, 2020 defendants filed four motions with oppositions due on April
20 30, 2020.

21 3. Plaintiff requires more time to complete the oppositions and on April 30
22 plaintiff's counsel sent an email to defendants' counsel, Mr. Mills, who responded and agreed to
23 an extension to May 4, 2020 to file the oppositions.

24 4. This motion is not made for the purposes of fraud or delay.

25 5. I declare under penalty of perjury that the foregoing is true and correct.

26 DATED this 30th day of April, 2020.

27
28 */s/ Ross Moynihan*
ROSS MOYNIHAN, ESQ.

MEMORANDUM OF POINTS AND AUTHORITIES

FRCP 6(b) states:

(b) Extending Time.

(1) In General.

When an act may or must be done within a specific time. The court may, for good cause, extend the time:

- (A) with or without motion or notice if the courts acts, or if a request is made, before the original time or its extension expires; or
- (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

LRIA6-1 states in pertinent part:

(a) A motion or stipulation to extend time must state the reasons for the extension requested and must inform the court of all previous extension of the subject deadline the court granted.

...

(c) A stipulation or motion to seeking to extend the time to file an opposition or reply to a motion, or to extend the time fixed for hearing a motion , must state in its opening paragraph the filing date of the subject motion or the date of the subject hearing.

Based upon the declaration of counsel, good cause exists for the extension of plaintiffs' time from April 30, 2020 to May 4, 2020 to respond to the defendant's motions filed as documents 68, 69, 70, 71 and plaintiff requests that the court grant this unopposed motion.

Dated this 30th day of April 2020.

STOVALL & ASSOCIATES

/s/ Ross Moynihan
ROSS H. MOYNIHAN, ESQ.
Nevada Bar No. 11848
2301 Palomino Lane
Las Vegas, Nevada 89107
Attorney for Plaintiffs

IT IS HEREBY ORDERED that Plaintiff's Unopposed Motion to Extend time to respond until May 4, 2020 (ECF No. 73) is GRANTED as it is supported by good cause and counsel represents it is unopposed.

Dated: May 1, 2020


DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE